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Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Dr. ORLY TAITZ, ESQ, PRO SE

§

Plaintiff,

§ Freedom of information violation

§ 5USC §552

v.

§ CASE #

§ Case: 1:11-cv-01421  
Assigned To : Lamberth, Royce C.  
Assign. Date : 8/4/2011  
Description: FOIA/Privacy Act

KATHY RUEMMLER in her capacity

§

as the White House counsel

§

and custodian of records

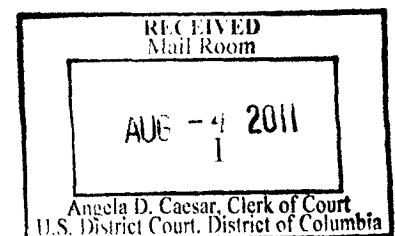
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§ oral argument requested

**COMPLAINT**

TAITZ V RUEMMLER 5 USC 552 FOIA



## **JURISDICTION**

Current complaint is filed under Federal statute 5U.S.C. 552 Freedom of Information Act and diversity

## **PARTIES**

Plaintiff, Dr. Orly Taitz, ESQ, President of "Defend our Freedoms Foundation",  
resident of California

Defendant, Kathy Ruemmler, in her official capacity as the White House  
Counsel, with business address in Washington DC

## **ALLEGATIONS**

1. For a period of nearly three years Mr. Obama has kept hidden his long form birth certificate, attesting to his Natural Born status, which is a requirement for one to become the U.S. President based on Article 2, section 1 of the U.S. Constitution.

2. Plaintiff herein, Dr. Orly Taitz, ESQ,(hereinafter "Taitz") is an attorney, who is a counsel in a legal action Barnett, Keyes, et al v Obama 8:09 cv 00082 USDC CD CA, and 10-55084 9th Circuit Court of Appeals, dealing with Mr. Obama's lack of the Natural Born status.

3. On MAY 2, 2011, Plaintiff was scheduled to conduct an oral argument in the Ninth Circuit Court of Appeals in Barnett, Keyes et al v Obama on the issue of Obama's lack of eligibility.

4. On April 27. 2011, only a few days prior to an oral argument, and with polls showing 2/3 of the American public doubting his birth place and legitimacy, Mr. Obama released, what he alleged to be a true and correct copy of his original long form birth certificate maintained in the vault of the Health Department of Hawaii.

5. On the same day Mr. Obama, together with former White House counsel, Robert Bauer, conducted a press conference, attesting to the legitimacy of his birth

certificate and attacking political dissident leaders and civil rights attorneys questioning his eligibility, by calling them "sideshow and carnival barkers".

6. Mr. Obama and Mr. Bauer alleged, that Mr. Obama's attorney Judith Curley travelled to Hawaii, received 2(two) separate certified copies of the original birth certificate, contained on file in the state department in Hawaii and delivered these two documents to the White House.

7. Mr. Obama and Mr. Bauer conducted a press conference and provided a white background copy of the document and made it available to the NBC reporter Savannah Guthrie and other reporters.

8. Another copy on secure green paper was posted on the official web site for the WhiteHouse.gov.

9. Within a short period of time multiple experts rendered an opinion, that the document posted on the White House.gov is not a true and correct copy of a 1961 original birth certificate, but a cheap forgery, a computer generated "document", created by cutting and pasting parts of different documents.

10. Printing and typesetting expert Paul Irely provided an affidavit (Exhibit 1), stating, that the document in question is clearly a forgery and contains letters and numbers from different type settings, which can be seen only in a forged document.

11. Adobe expert Chito Papa provided an affidavit, showing, that parts of the document were created in Adobe computer program in layers. (Exhibit 2)

12. Scanning and printing machines expert Douglas Vogt has provided an affidavit, showing kerning, different typesetting, different color, digital, color and grayscale intertwined imaging and other signs of forgery. (Exhibit 3)

13. At the same time Taitz, Plaintiff herein, obtained verification from the Selective Service, that Obama is using a Connecticut Social security number xxx-xx-4425, while Obama was never a resident of Connecticut (Exhibit 4, redacted

selective Service certification of Barack Obama) (Exhibit 5, unredacted Selective Service certificate of Barack Obama submitted under seal)

14. Social Security Verification systems provided a response, that the Social Security number in question xxx-xx-4425 was never issued to Barack Obama, which show that Obama is fraudulently using a social security number, which was never issued to him. This represents additional evidence pointing to lack of a valid birth certificate, as typically individuals without a valid birth certificate have to resort to using invalid and fraudulently obtained social security numbers.(Exhibit 6 redacted Social Security Verification Systems letter ) (Exhibit 7, unredacted Social Security verification letter submitted under seal)

15. Taitz obtained from the Student Clearing house an official record of Obama's attendance at the Columbia university, which shows him attending that university only for 9 (nine) month in contrast to Obama's assertions, which points to the general pattern of fraud in relation to Obama's vital records. (Exhibit 8 Student Clearing house certification of attendance of Columbia University by Obama for only 9 months.)

16. On June 1, 2011 USDC for the District of Columbia issued an order for the parties to file dispositive pleadings in Taitz v Astrue 11-cv-402 RCL, a case, where the same Plaintiff is seeking an original SS-5 application for Connecticut Social Security number xxx-xx-4425, which Mr. Obama is using according to his Selective Service certificate, but which was never assigned to him according to the Social Security administration (Exhibits 4, 5). This order was held by the clerks of the court and not posted on the electronic docket until June 3, 2011.

17. On June 2, 2011, as the above order was issued, but not docketed yet, the White House counsel , Robert Bauer resigned and a new White House counsel, Kathy Ruemmler was appointed.

8. Next day, on June 3rd, Taitz forwarded to Ms. Ruemmler request for inspection of the two "certified copies" of the original long form birth certificate for Mr. Obama, which allegedly were hand carried to the White House by Perkins Coie attorney, Ms. Judith Corley and provided to the public and reporters by the former White House counsel, another Perkins Coie attorney, Mr. Robert Bauer. Taitz requested inspection of those allegedly "certified copies", that are now in Ruemmler's custody.

9. Ruemmler did not respond.

10. Taitz forwarded to Ruemmler a second request under 5 USC 552 Freedom of Information act.

11. Ruemmler did not respond.

12. In light of lack of response, overwhelming evidence of forgery and general campaign of cover up and stone walling, further requests are futile.

13. FOIA provides disclosure of the public documents held by the agencies of the federal government.

14. 5 USC 552 (6) private records exception does not apply in this case, as Barack Obama already made the document in question public by posting it on WhiteHouse.gov. At this point privacy is no longer at issue. The only issue is forgery, which can be ascertained by the inspection of the hard copies of the document.

15. Public interest in ascertaining, whether the person occupying the position of the U.S. President, is doing so based on a forged U.S. birth certificate, outweighs any possible privacy concerns. Multi Ag, 515 F.3d at 1229-30; see, e.g., Barnard v. DHS, 598 F. Supp. 2d 1, 11 (D.D.C. 2009); Schoenman v. FBI, 576 F. Supp. 2d 3, 9 (D.D.C. 2008); Unidad Latina En Accion v. DHS, 253 F.R.D. 44, 48 (D. Conn. 2008); Schoenman v. FBI, 573 F. Supp. 2d 119, 148 (D.D.C. 2008); Schoenman v. FBI, 575 F. Supp. 2d 136, 160 (D.D.C. 2008). as the D.C. Circuit

has held, "a privacy interest may be substantial -- more than de minimis -- and yet be insufficient to overcome the public interest in disclosure."

16. While 5 USC 552 excludes "central offices of the White House", this exclusion will not apply in this case, as term "central offices of the White House" relates to the documentation obtained and generated by the President as part of his duties. A copy of a birth certificate from 1961, 50 years ago, does not relate to the duties of the President, which commenced only two and a half years ago, this document relates to legitimacy of Mr. Obama and his right to be in those "central offices of the White House" in the first place. If he was never eligible to be there in the first place, he is not eligible to claim the privilege.

17. This is the case of first impression, as there was never a case in the U.S. history, when a person occupying the position of the U.S. President, did so, while using a forged birth certificate and attempting to defraud the public by posting on line, on WhiteHouse.gov, an alleged computer generated, forged birth certificate.

18. The closest case in the U.S. history is **United States v. Nixon**, 418 U.S. 683 (1974), which originated in the DC court, when Hon. John Sirica granted the motion to compel subpoena by Leon Jaworski. Judge Sirica's decision was confirmed by the Supreme Court of the United States. Just as the Watergate tapes showed high probability of the criminal wrongdoing, which later indeed led to multiple criminal convictions, there is a high probability of criminal wrongdoing by Mr. Obama, former White House counsel Robert Bauer, Mr. Obama's personal attorney Judith Corley of Perkins Coie, State Registrar, Hawaii Department of Health Alvin T. Onaka and a number of other individuals. Such wrongdoing can be shown by examining hard copies of the alleged long form 1961 birth certificate of Mr. Obama, posted by Mr. Obama on the official White House website WhiteHouse.gov.

Wherefore Plaintiff respectfully requests this court to

1. Order the defendant to provide the plaintiff access for inspection of the two certified copies of the original long form birth certificate of Barack Obama, which are currently in possession of the White House counsel Mr. Kathy Ruemmler

2. Attorneys fees incurred by the Plaintiff, as counsel for the "Defend Our Freedoms Foundation" in attempting to obtain such documents under 5USC 552 FOIA

3. In light of the overwhelming public interest Plaintiff requests expedient processing of this complaint, as well as open court oral argument.



/s/ Dr. Orly Taitz, ESQ

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